



COMMONWEALTH of VIRGINIA

Molly Joseph Ward
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY

Blue Ridge Regional Office

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COMMONWEALTH OF VIRGINIA Department of Environmental Quality Blue Ridge Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Addendum to the May 20, 2008 Statement of Basis

Huber Engineered Woods, LLC
Chaney Lane – Route 3, Highway 626, Halifax County, Virginia
Permit No. BRRO-30905

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9VAC5 Chapter 80, Huber Engineered Woods, LLC has applied for a minor modification of the Title V Operating Permit for its Crystal Hill, Virginia facility. The Department has reviewed the application and has prepared a proposed Title V Operating Permit.

Engineer/Permit Contact: _____

Thomas H. Berkeley, PE
(434) 582-6205

Date: _____

Air Permit Manager: _____

David J. Brown

Date: _____

Deputy Regional Director: _____ Date: _____



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FACILITY INFORMATION

Permittee

Huber Engineered Woods, LLC
P.O. Box 38
Crystal Hill, VA 24539

Facility

Huber Engineered Woods, LLC: Crystal Hill Plant
Chaney Lane - Route 3, Highway 626, Halifax County, Virginia

County-Plant Identification Number: 51-083-00050

SOURCE DESCRIPTION

NAICS Code: 321219 – The facility manufactures a reconstituted wood product known as oriented strandboard (OSB).

The facility is a Title V major source of Particulate Matter (PM₁₀), Nitrogen Dioxides (NO_x), Carbon Monoxide (CO), and Volatile Organic Compounds (VOC). This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility was previously permitted under a Minor New Source Review (NSR) Permit dated 10/16/07, as amended 3/6/08.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

Generally, the emission units and the control devices at Crystal Hill remain as described in the Statement of Basis dated 5/20/08.

However, on 4/3/14 BRRO received Huber's application dated 4/2/14 which described planned construction activities at the facility which will result in the substitution of 2 TSI dryers for the 2 currently permitted MEC dryers at Crystal Hill. The application cover letter¹ comes to the conclusion that this substitution is not subject to pre-construction permitting in accordance with the current provisions of Article 6. The same letter requests this minor Title V permit modification to alter the equipment at the site as follows:

- The dryer portion of the "Emission Unit Description" for the Energy System and Dryers (ES&D) as shown in Section II, "Significant Emissions Units" table, is changed:
 - From: (2) MEC 1360 TNF/G triple pass rotary dryers and
(2) TSI Single Pass rotary dryers
 - To: (4) TSI Single Pass rotary dryers

The application meets the requirements of 9VAC5-80-210 for minor Title V permit modifications.

EMISSIONS INVENTORY

Emissions are summarized in the following table.

2012 Actual Emissions

	Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO ₂	PM ₁₀	NO _x
Total	100.3	95.5	11.8	85.0	104.7

EMISSION UNIT APPLICABLE REQUIREMENTS

The set of applicable requirements for the facility is unchanged from those described in the Statement of Basis (SOB) dated 5/20/08.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also

¹ The application cover letter was revised and resubmitted. That revised letter was dated 5/7/14 and was received 5/9/14.

requires notification of deviations from permit requirements or any excess emissions.

Throughout the permit, references to the name of the DEQ regional office are updated to the "Blue Ridge Regional Office" (BRRO). Except for changes to match this office name update, the set of general conditions for the facility is unchanged from those described in the SOB dated 5/20/08.

STATE ONLY APPLICABLE REQUIREMENTS

None. (No change from 5/20/08 SOB.)

FUTURE APPLICABLE REQUIREMENTS

None at this time. (No change from 5/20/08 SOB.)

INAPPLICABLE REQUIREMENTS

None identified. (No change from 5/20/08 SOB.)

COMPLIANCE PLAN

None at this time. (No change from 5/20/08 SOB.)

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. The set of insignificant emission units for the facility is unchanged from those described in the SOB dated 5/20/08.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review. (No change from 5/20/08 SOB.)

PUBLIC PARTICIPATION

In accordance with 9VAC5-80-210 D, public participation requirements do not extend to minor Title V permit modifications